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June 22, 2017

Via ECF

Hon. Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Walter Noel IV v. Laidlaw & Company, Ltd.*, 16 CV 3975

Dear Judge Berman:

We represent Plaintiff Walter Noel IV and 17 Opt-in Plaintiffs in the above-referenced employment matter. We write to supplement our June 20, 2017 letter with an accounting of Plaintiff Noel's out-of-pocket expenses incurred in the matter, in lieu of receiving an incentive payment, which courts routinely allow. *See Silberblatt v. Morgan Stanley*, 524 F. Supp. 2d 425, 436 (S.D.N.Y. 2007) (awarding a service award for reasonable out-of-pocket expenses).

On April 12, 2017, Plaintiff Noel attended a mediation on behalf of himself and the Opt-in Plaintiffs. To attend, he traveled the night before, April 11, 2017, from Washington, D.C., where he resided, to New York City, returning on April 12, 2017. In doing so, he incurred the following out-of-pocket expenses:

- $8.00 for Baltimore Tunnel (2 trips at $4.00 per trip);
- $8.00 for Perryville toll;
- $4.00 for Delaware Bridge;
- $15.00 for Lincoln Tunnel;
- $25.10 for NJ Turnpike (2 trip at $12.55 per trip);
- $34.00 for Midtown Tunnel (4 trips at $8.50 per trip);
- $57.00 for parking in New York;
- approximately $70.00 for food; and
- approximately $120.00 for gasoline.

In total, Plaintiff Noel's **out-of-pocket expenses are approximately $341.10**.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Walker G. Harman, Jr.

cc: Tania J. Mistretta, Esq. (via ECF)
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